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5 IN THE UNITED STATES DISTRICT COURT
6
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

11 This Document Relates to:
12 ALL CASES
13

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
6 Special Master Review on March 18, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries
10 was challenged. The Brief included the general background of the privilege dispute process to
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on
14 March 18, 2025 contained entries still in dispute for custodian Katy McDonald.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on
16 March 18, 2025 did not contain any entries for the custodians that overlapped with custodians
17 already submitted to the Special Master for review.

18 **Katy McDonald**

19 6. Defendants included approximately 4,634 entries for Katy McDonald across its
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 3,321 of these 4,634 entries.

22 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege to 1,651
23 entries in full and 377 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log
25 after Defendants re-reviewed all entries in dispute. Defendants withdrew their claim of privilege
26 to 2,281 entries in full and 527 entries in part.

27 _____
28 ¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.
See ECF No. 2357.

14. Defendants did not provide redacted versions of the six entries they identified during the meet and confer process.

/s/ Tiffany R. Ellis
Tiffany R. Ellis